

From: Daniel L. Schmutter <DSchmutter@hartmanwinnicki.com>  
Sent: Thursday, February 23, 2023 5:49 PM  
To: Daniel Vannella <Daniel.Vannella@law.njoag.gov>; blehman@gsbblaw.com  
<BLEhman@gsbblaw.com>; lgalella@parkermccay.com <lgalella@parkermccay.com>;  
mjacobs@cgajlaw.com <mjacobs@cgajlaw.com>; Kathleen N. Fennelly <KFennelly@mdmc-law.com>  
Cc: Nicholas Kant <Nicholas.Kant@law.njoag.gov>; Rachel Manning <Rachel.Manning@law.njoag.gov>  
Subject: [EXTERNAL] RE: ANJRPC/Cheeseman/Ellman (No. 18-10507) -- 3/2 conference and joint  
discovery plan

Thanks. We will definitely be requesting an adjournment.

Dan

---

Daniel L. Schmutter, Esq.  
Hartman & Winnicki, P.C.  
74 Passaic Street  
Ridgewood, New Jersey 07450  
Tel.: [\(201\) 967-8040](tel:(201)967-8040)  
Fax: [\(201\) 967-0590](tel:(201)967-0590)  
[www.hartmanwinnicki.com](http://www.hartmanwinnicki.com)

From: Daniel Vannella <Daniel.Vannella@law.njoag.gov>  
Sent: Thursday, February 23, 2023 5:10 PM  
To: Daniel L. Schmutter <DSchmutter@hartmanwinnicki.com>; blehman@gsbblaw.com;  
lgalella@parkermccay.com; mjacobs@cgajlaw.com; Kathleen N. Fennelly <KFennelly@mdmc-law.com>  
Cc: Nicholas Kant <Nicholas.Kant@law.njoag.gov>; Rachel Manning <Rachel.Manning@law.njoag.gov>  
Subject: Re: ANJRPC/Cheeseman/Ellman (No. 18-10507) -- 3/2 conference and joint discovery plan

Also, I am generally available the weeks of 3/6 and 3/13 for purposes of when the court might  
reschedule the conference.

---

From: Daniel Vannella  
Sent: Thursday, February 23, 2023 5:00 PM  
To: Daniel L. Schmutter  
<[DSchmutter@hartmanwinnicki.com](mailto:DSchmutter@hartmanwinnicki.com)>; [blehman@gsbblaw.com](mailto:blehman@gsbblaw.com) <[BLEhman@gsbblaw.com](mailto:BLEhman@gsbblaw.com)>; [lgalella@parkermccay.com](mailto:lgalella@parkermccay.com) <[lgalella@parkermccay.com](mailto:lgalella@parkermccay.com)>; [mjacobs@cgajlaw.com](mailto:mjacobs@cgajlaw.com) <[mjacobs@cgajlaw.com](mailto:mjacobs@cgajlaw.com)>;  
Kathleen N. Fennelly <[KFennelly@mdmc-law.com](mailto:KFennelly@mdmc-law.com)>  
Cc: Nicholas Kant <[Nicholas.Kant@law.njoag.gov](mailto:Nicholas.Kant@law.njoag.gov)>; Rachel Manning <[Rachel.Manning@law.njoag.gov](mailto:Rachel.Manning@law.njoag.gov)>  
Subject: ANJRPC/Cheeseman/Ellman (No. 18-10507) -- 3/2 conference and joint discovery plan

Hi Dan S.:

When we spoke yesterday you indicated that plaintiffs wanted to know if the State consented  
to asking that the 3/2/23 conference with Judge Goodman be adjourned (and, relatedly, that

the deadline to submit a joint discovery plan, which I believe would be tomorrow, be adjourned). I said we did consent, and my understanding was that you would loop in co-defendants for their consent as well as make the request to the court.

I'm looping in hopefully all current counsel for the parties for awareness. I don't want to miss the deadline, but I also don't want to have to work to get something finished if the plan is to ask for more time.

Dan

Daniel M. Vannella  
Assistant Attorney General  
Litigation Practice Group  
Division of Law  
25 Market St. | P.O. Box 112  
Trenton, N.J. 08625  
t: 609-376-2776  
[daniel.vannella@law.njoag.gov](mailto:daniel.vannella@law.njoag.gov)

CONFIDENTIALITY NOTICE The information contained in this communication from the Office of the New Jersey Attorney General is privileged and confidential and is intended for the sole use of the persons or entities who are the addressees. If you are not an intended recipient of this e-mail, the dissemination, distribution, copying or use of the information it contains is strictly prohibited. If you have received this communication in error, please immediately contact the Office of the Attorney General at (609) 292-4925 to arrange for the return of this information.